

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RECEIVED  
SDNY PRO SE OFFICE  
2019 MAY -2 PM 1:08

S.D. OF N.Y.

Elizabeth Grant

GRALE GRANT

Co-Plaintiff

Write the full name of each plaintiff.

19 CV 3970  
(To be filled out by Clerk's Office)

-against-

ASPCA, NYPD, DA Brown, ADA  
Cafferi, Mayor Deery, Ruben Salas

COMPLAINT  
(Prisoner)

Do you want a jury trial?

☒ Yes ☐ No

Whitaker will  
help the case

Write the full name of each defendant. If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section IV.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**I. LEGAL BASIS FOR CLAIM**

State below the federal legal basis for your claim, if known. This form is designed primarily for prisoners challenging the constitutionality of their conditions of confinement; those claims are often brought under 42 U.S.C. § 1983 (against state, county, or municipal defendants) or in a "Bivens" action (against federal defendants).

☒ Violation of my federal constitutional rights

☐ Other: \_\_\_\_\_

**II. PLAINTIFF INFORMATION**

Each plaintiff must provide the following information. Attach additional pages if necessary.

Ember Mary Grant  
First Name Middle Initial Last Name

State any other names (or different forms of your name) you have ever used, including any name you have used in previously filing a lawsuit.

4411805772  
Prisoner ID # (if you have previously been in another agency's custody, please specify each agency and the ID number (such as your DIN or NYSID) under which you were held)

Rose M. Singer 19 Hurst St East Elmhurst NY 11370  
Current Place of Detention

1919 Hazen Street  
Institutional Address

East Elmhurst NY 11370  
County, City State Zip Code

**III. PRISONER STATUS**

Indicate below whether you are a prisoner or other confined person:

- ☒ Pretrial detainee  
☐ Civilly committed detainee  
☐ Immigration detainee  
☐ Convicted and sentenced prisoner  
☐ Other: \_\_\_\_\_

## V. STATEMENT OF CLAIM

Place(s) of occurrence: 25-47 1/2 W 1st St Eastchester NY 11370

Date(s) of occurrence: August 29, 2018

### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and how each defendant was personally involved in the alleged wrongful actions. Attach additional pages as necessary. P1

I seek relief from the court due to the injustice I have ascertained. My first case in 2016 involved my son getting hit in the head by mistake and JASA getting involved. Supposedly JASA Adult Protective just wanted to help and clean behavior and bring the animals back. I had a rescue and I was saving special needs and older animals. By the way I am a teacher, tutor, Professor and Educational Director so I had enough money to support the animals food, veterinary bills, grooming supplies like Litter, Litter boxes and beds, bath towels and cleaning supplies. JASA worked with ASPCA Kill Shelter and NYPD to have the pets removed illegally. JASA wanted to railroad my man to a nursing home and get rid of he and the pets. JASA did help ASPCA Kill Shelter illegally attempt to get rid of the pets with the NYPD. What JASA does with ASPCA Kill Shelter NYPD and DA Richard Brann and in 2016, new to her job ADA Nicoletta Cafferri, was to get together to back each other up in lies to illegally steal the animals and simply character assassinate me in the media so that I can have a jury trial because I will also be falsely arrested, charged, convicted and incarcerated. The nightmare doesn't end because I lost the pets I love because ASPCA Kill Shelter had the pets that were older and special needs killed and the rest of the animals that were salable would be adopted out. The concept it is my property so my fourth amendment right to property and privacy has been violated and due to the illegal, warrantless search and seizures. This situation then passed to the Queens DA and ADA Cafferri having me falsely arrested stopping my work for over 3 years putting my house into foreclosure. I was falsely convicted of a multitude of counts that have never explained and charges were put on me although there were 500 pictures in my house and not one shows a pet or a stuffed animal which is what I was charged for. I got probation which is a trap and I was encountered with probation officers trespassing and

DR Drawing my "ass" saying I had to open the back windows door furniture  
Case 1:19-cv-03689-RGB Document 1 Filed 05/05/19 Page 6 of 11 PageID #: 6  
pushing my nonverbal performing "elder abuse". Illegal pictures are being taken by  
Monique Bezy and Aulien Sobu. Monique Bezy and Aulien Sobu stuck their foot in  
the door and pushed me backwards as Rev. Way of Yotky is the house, Monique  
80 and they would have broken her bones. Monique Bezy and Aulien Sobu never identify  
themselves. Don't have a warrant and produce a piece of paper quickly through that  
monique saying "I signed it, when I have signed probation papers. The probation papers  
had <sup>my name</sup> ~~the name~~ Clerk wrote Refusal to sign "because I didn't have any of my glasses.  
I also need to add this wasn't a Routine visit, it was a planned false arrest. Monique Bezy  
and Aulien Sobu had Bought the SWAT team with them. I looked at my shower room window  
in my basement apartment and a multitude of cops and cop cars were there plus the chiefs of  
police and Detective Walker. This was a planned false arrest After Monique Bezy says to Mon  
that she has to see me and also does Aulien Sobu Ever though mon doesn't know who these  
INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

My arms are injured from the 115th police pulling on them. My legs and knees are injured from being dragged on the ground. My back hurt from being pulled and dragged around from the police. I was harshly thrown against the 115th police. I was harshly put into the car as you can see on video because I can not sit or hard cut to it. I will lose all blood in my hands and arms so I am smothered sideways getting into the police car and have suffered injuries from being stored sideways harshly. When I am brought into the precinct I am dragged on my knees almost dislocating one of my knees and my entire back screaming.

State briefly what money damages or other relief you want the court to order.

State briefly what money damages or other relief you want the court to order:

The Court should help me be removed from Rose Minger Pickers Island. Both my  
boy's cases, stem from the fraud of illegal warrantless search and seizure in R  
Kansading. I have an falsely incarcerated at Rose Minger Pickers Island. I  
would like to be removed from Rose Minger on good faith because I have always  
attended every court date. I have served 8 months for a crime I am  
I am not even guilty of and is in an appeal. My lawyers have allowed the DA  
office to do no 41a to hearing where I could speak, man could speak and  
land could be set or restoration could happen because it really am not  
guilty of an violent or cruel actions even. There is no hold on me because it is  
a city year, the search. I would like also to add that it is just fair and proper  
that a full investigation auditing the AS PCA Kulstate because R gets



women are man is trying to get her to go to the front of the house to go to the front of my basement apartment while these women outrightly refuse. I am so worried about Mans safety after she says "Please Elizabeth these women say they want to come in to see you, so please come upstairs. I have to push in furniture to get into the kitchen to check on mans safety. When I finally push things to get upstairs man is pinned against the dishwasher terrified as these two probation officers keep taking illegal pictures they refuse to present as discovery because the pictures of the animal will be favorable. The pets were clean, well fed, chubby, no ear mites, no fleas, fleas or any minor outer illnesses. All pets were fluffy and well fed and loved. To get back to the issue at hand. Monique Benny who is unidentified to me and man at the time pushes man and he and says. I am going to search upstairs. Me and man follow after her. Now she has stated too obvious that this was not a routine visit, it is an illegal warrantless search and seizure with ransacking. Monique Benny runs upstairs and is prying doors so hard one is fully off the hinges. Man is balanced on the steps and her sweet Chihuahua cones running are to help to protect her on the stairs and Monique Benny is so busy taking a picture of the Chihuahua that she is knocking Man down the stairs. When I try to straighten Man up so she doesn't fall I say to Monique Benny what are you doing and she says "I am getting you an Assault." She calls Dan to Arden Suba and says because Arden Suba is in the living room on the middle floor. She says call in an assault within 10 seconds the police were outside barely gave me time to get

back to my breast exposed and are not even telling me, why I am  
 arrested, not reading my rights, not letting me get water when I  
 am passing out, not allowing me to put on a sanitary napkin or tights.  
 Not allowing me to put underwear, clothes or shoes on, walking me  
 through the middle of the street embarrassing me in front of neighbors,  
 dragging me by my arms hurting me, hurting my legs and knees dragging  
 them on the ground, etc. Videoing me lying in the car - why was this  
 necessary? I've never seen that before why breasts hung out for the  
 camera. I am not sitting my hands cuffed so I am forced to lie  
 sideways in pain. I am dragged into the precinct. I am set in the  
 view of the front door. People are staring at me with blood pouring  
 down my legs. I sit there near of the doorway for four hours so  
 everyone can see me sitting in a tiny room in pain bleeding all over myself.  
 My man is by the house and actually has been thrown out of  
 the house by the unidentified, deplorable Morique.

Dr. Creating my house identified, terrorizing breaking windows doors furniture  
 pushing my man and performing 'elder abuse'. Illegal pictures are being taken by  
 Monroe Begg and Andrew Soban. Monroe Begg and Andrew Soban stuck their foot in  
 the door and pushed me backwards as Rev. my of getting in the house, Mon  
 30 and they would have broken her bones. Monroe Begg and Andrew Soban never identify  
 herself. Don't have a warrant and produce a piece of paper quickly through that  
 man and saying 'I signed it, when I have signed probation papers, no probation papers  
 had that. Clerk wrote 'Refusal to sign' because I didn't have any of my glasses.  
 I also need to add this was not a Routine Visit, it was a planned false arrest. Monroe Begg  
 and Andrew Soban took Brought the shirt from with them. I looked at my shower room window  
 in my basement apartment and a multitude of cops and cop cars were there plus the chiefs of  
 police and Detective Walker. This was a planned False Arrest After Monroe Begg says to Mom  
 that she has to see me and so does Andrew Soban. Even though none doesn't know who these  
 INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment,  
 if any, you required and received.

My arms are injured from the 15th police pulling on them. My legs and knees are  
 injured from being dragged on the ground. My back hurt from being  
 pulled and dragged around from the police. I was harshly thrown against  
 the door police. I was harshly put into the car as you can see on video because  
 I can not sit or hard cut to go. I will lose all blood in my head and am so  
 I am smothered sideways getting into the police car and have suffered injuries  
 from being stored sideways badly. When I am brought into the present I am dragged  
 VI. RELIEF my knees almost dislocate one of my knees and my entire  
 he screaming  
 State briefly what money damages or other relief you want the court to order.

The court should help me be removed from Rose Morgan Pickers Island. Both of my  
 bogus cases, stem from the fraud of illegal warrants, search and seizures with  
 harassing. I have an falsely incarcerated at Rose Morgan Pickers Island. I  
 would like to be removed from Rose Morgan as good faith because I have always  
 attended every court date. I have now served 8 months for a crime where  
 I am not even guilty of and is in an appeal. My lawyers have allowed the DA's  
 office to do no 4th 7th hearing where I could speak, men could speak and  
 bail could be set or restoration could happen because it really is not  
 guilty of an violent or cruel actions even. There is no hold on me because it is  
 a city year, the search. I would like also to add that it is just for an proper  
 that a full investigation auditing the AS PCA Kulstete because the pets

PM

women are man is trying to get her to go to the front of the house to go to the front of my basement apartment while these women are outwittedly refuse. I am so worried about Mans safety after she says "Please Elizabeth these women say they want to see you so please come upstairs. I have to push in furniture to get into the kitchen to check on mans safety. When I finally push things to get upstairs man is pinned against the dishwasher terrified as there are no probation officers keep taking illegal pictures they refuse to present as discovery because the pictures of the animals will be favorable. The pets were clean, well fed, chubby, no ear mites, dental disease, fleas or any micro or macro illnesses. All pets were flawless and well fed and loved. To get back to the issue at hand. Monique Begy who is unidentified to me and man at the time pushes man and he and says. I am going to search upstairs. Me and man follow after her. Now she has stated. It is obvious that this was not a random visit, it is an illegal warrantless search and seizure with ransacking. Monique Begy runs upstairs and is prying doors so hard one is fully off the hinges. Man is balanced on the steps and her sweet Chihuahua loves running are to help to protect her on the stairs and Monique Begy is so busy taking a picture of the Chihuahua that she is knocking Man down the stairs. When I try to straighten Man up so she doesn't fall I say to Monique Begy what are you doing and she says "I am getting you an Assault." She calls Dan to Arden Subu and says because Arden Subu is in the living room on the middle floor. She says call in an assault within 10 seconds the police were outside barely gave me time to get



## (i) The Facts

P3

back to my basement apartment and are not even telling me, why I am arrested, not reading my rights, not letting me get under what I am passing out, not allowing me to put on a sanitary napkin or tissues. Not allowing me to put underwear, clothes or shoes on, walking me through the middle of the street embarrassing me in front of my neighbors, dragging me by my arms hurting me, hitting my legs and knees dragging me on the ground, etc. Videoing me lying in the car - why was this necessary? I've never seen that before my breasts hung out for the camera. I cannot sit on my hand cuffs as I am forced to lie sideways in pain. I am dragged into the precinct. I am set in the view of the front door. People are staring at me with blood pouring down my legs. I sit there for hours for hours 30 of everyone can see me sitting in a tiny room in pain bleeding all over myself.

My man is by the house and actually has been thrown out of the house by the unidentified, deplorable Monique Begg and Akeia Solon. Man is stuck on the porch all day with no way to use the bathroom. Her pocket book her wallet, car, phone, and hearing aids were confiscated. Monique Begg and Akeia Solon never identified themselves or asked the diets or growing babies anything about the pets. So the pets welfare was not a priority just stealing their money and getting away for fighting them on Facebook and through lawsuits. The case is a crime conscious, because there was NO REASON to steal the animals. - They were fine - There was no reason to arrest me - I wasn't doing anything but the Queens District Attorney's Office will still be keeping me put even though it is the second 3 months I go for no reason. A which will probably cease down from an appeal. Refracts lead to the point that I am suffering for something I didn't



ps

Rescued and scared as in my instance.

I firmly know and believe that my first amendment rights were and are being inhibited because my facebook page was my outlet to defend myself in court issues and have the public see my house looking fine and the animals looking fine and the animals looking healthy, chubby, without a scratch. And see the fraud of a press release, newspapers and internet describing my house in an abusive, unrealistic, delusional, hyped up exaggeration.

I guess you would call this a collaborated hoax. Right now it is quite a pathetic, collaborated hoax because this the Police Officers and Probation officers planning an illegal warrantless search and seizure, breaking, trespassing, damaging, doors, windows, furniture, terrorizing my 80 year old mother. And horrifying poor innocent animals that are in no need at all to leave the house.

The most recent video Hello - no tyrek - suits - no one gasping for air - police walking all over the house. My favorite part of this video was to see officers not reading me my rights - me volunteering information - not being told anything I say can or will be used against me and I should want to speak till when a lawyer is present. You see the officer the officer (police) sees that I am bleeding between my legs and heartlessly I am not being allowed to put on clothes, underwear, a sanitary napkin or a tampon.

P6

You see in the video that I am being dragged out and not  
 allowed to put shoes on to humiliate and degrade me  
 It seems since I went on Facebook and spoke about the  
 ASPCA kill shelter, fraud, District Administrator and Judicial  
 fraud in general, Sorry if it was easy to pull it up on the  
 Internet. Don't be mad at me because I pulled up the fraud.  
 Maybe all of you should do your jobs right in the first  
 place. Do your jobs conscientiously, being just and fair  
 realizing when you took these jobs, you took oaths to  
 honor and obey the law not override the law and rewrite  
 the law to suit yourself. My trial notes show Judge  
 Stephanie Zeno, "I do what I want when I want but in  
 reality, "no delusions", the ASPCA kill shelter is the core and help  
 from NY PD and New Police officers who do what they want when they  
 want, just busting everyone over house illegally overriding  
 273 law taking animals before conviction, trespassing and  
 breaking in, conspiring together to abuse people and  
 animals, knowing you'll always be the winners" because you  
 have worked <sup>being</sup> so well connected with having DA Brown to  
 have the scripted Press Releases written by the paid, Walt  
 Disney ghost writer. The stories are so ridiculous that only  
 ADA Caffer, telling these scripted lies would be  
 ridiculous enough to be the voice of such "garbage  
 news", that only the Enquirer would entertain the.  
 Enquirer is the only newspaper that would entertain  
 these ridiculous stories about me because all that was

## Facts Cont

(1)

P1

woman and man is trying to get her to go to the front of the house to go to the front of my basement apartment which these women outrightly refuse. I am so worried about Mans safety after she says "Please Elimber these women say they want to come to see you, so please come upstairs. I have to push in furniture to get into the kitchen to check on mans safety. When I finally push things to get upstairs man is pinned against the dishwasher terrified as there are no probation officers keep taking 11 good pictures they refuse to present as discovery because the pictures of the animals will be favorable. The pets were clean, well fed, chubby, no ear mites, Aerial Disease, fleas or any inner or outer illnesses. All pets were flawless and well fed and loved. To get back to the issue at hand. Monique Begg who is unidentified to me and man at the time pushes man and he and says. I am going to search upstairs. Me and man follow after her. Now she has stated. It is obvious that this was not a random visit, it is an illegal warrantless search and seizure with ransacking. Monique Begg runs upstairs and is pushing doors so hard and is pulling off the hinges. Man is balanced on the steps and her sweet Chihuahua Doves running are to help to protect her on the stairs and Monique Begg is so busy taking a picture of the Chihuahua that she is knocking Man down the stairs. When I try to straighten Man up so she doesn't fall I say to Monique Begg what are you doing and she says "I am getting you an Assault." She calls Dan to Arden John and says because Arden John is in the living room on the middle floor. She says call in an assault within 10 seconds the police unit is outside. Barely give me time to get



The facts

2

P3

back to my breast exposed and are not even telling me, why I am arrested, not reading my rights, not letting me get under what am passing out, not allowing me to put on a sanitary napkin or tuzon. Not allowing me to put underwear, clothes or shoes on, walking me through the middle of the street embarrassing me in front of neighbors, dragging me by my arms hurting me, hitting my legs and knees dragging me on the ground, etc. Videoing me while in the car - why was this necessary? I've never seen that before my breasts hung out for the camera. I cannot sit on my hand cuffs so I am forced to lie sideways in pain. I am dragged into the precinct. I am set in the view of the front door. People are staring at me with blood pouring down my legs. I sit there near of the doorway for four hours so everyone can see me sitting in a tiny room in pain bleeding all over myself.

My mom is by the house and actually has been thrown out of the house by the unidentified, deplorable Monique Perry and Anala Solon. Mom is stuck on the porch all day with no way to use the bathroom. Her pocketbook for walker cane, phone, and hearing aids were confiscated. Monique Perry and Anala Solon never identified themselves or asked the diets or growing labels anything about the pets so the pet welfare was not a priority just stealing their jewelry, phone and spitting fire for fighting them on Facebook and filing lawsuits. The case is a crime conscious, made because there was NO REASON to steal the animals. - They were fine - There was no reason to arrest me - I wasn't doing anything but the Queens District Attorneys of Fice will still be keeping me put even though it is the seventh month 1 year in misdemeanor which will probably come down from an appeal. The facts lead to the point that I am suffering pain for this I didn't

p 3

So it is obvious to take advantage of the situation of Judge Stephanie Zaro working hand in glove with the District Attorney working hand in glove with the ASPCA Kull Shelter and NY PD are the bullies with their arrested incarceration "who will cover for their profiting from the demise of the animals and allow ASPCA, Kull's better to get away with murder figuratively and literally. It's called "cut back" robots", I am hoping for more scriptures in the future from these people.

As an example let's discuss Tom Rider in ASPCA's famous Ringling Brothers case of live a fake "lying" witness to produce a fraudulent outlandish case and close down a circus that has made people happy for decades ASPCA or ARA, the "Association for cruelty to animals" has been given tons of money, money on those Sarah McLoughlin's, "Give us your money, commercials, to pretend to save animals while they are at Kull Shelter and affiliated with a Kull Shelter."

Tom Rider was bribed 1900 \$100, with 11 installments into his bank account regularly. If ASPCA had any standing of Justice they wouldn't have been caught up being <sup>such</sup> despicable using people who convey every penny out of their pockets with corroborating lying stories like mine. Older and special needs have suffered "Rages from ASPCA Kull Shelter", fraud of these publicity stunts for donations replenishing inventory! Animals have an uncertain death and have not been



P04

this is 20/20's video depiction of the Lies and thievery about farmers, breeders, show dog people and rescuers like me. Rescuers and Breeders, leaving, healthy animals are stolen just so ASPCA, KILL shelter can do their publicity stunts for donations to replenish inventory.

The probation officers obviously didn't bring 30 police officers and the Chiefs of police to a routine visit, this was a planned false arrest and a planned warrantless, illegal, search and seizure with ransacking. Monroe Begg and Andrew Soban brought the SWAT TEAM to terrorize an 80 year old woman - my mom - purposely and to steal with no heart - Just "CRUELTY" - her companion pets - even taking her 2 Beta Fish? Wow, you ASPCA have proven to be the low down, dirty, beneath contempt people I said you were. For the past 3 years ASPCA KILL shelter has proven me right by secretly and obviously stealing these companion pets.

Pets were carried out so you know they are healthy - No "crusty eyes", no fleas, no ear mites, no dental disease, no diseases at all - Animals that don't need rescuing at all you just want to steal them because I am a target of character assassination. In a press release from Richard Browne ghost writers - script writers - who make the story and the house sound like a bad Walt Disney film bringing their lowly childish comments and scenarios to a first grade level.

p.7

Everything in the press release Myron wants her pets back written about me is so untrue, delusional and trashy <sup>and it's her mess</sup>

My man was coerced, tricked, threatened and blackmailed to try to sign over her pets to ASPCA Kill Shelter thinking she would get her daughter back in return, which never happened. Mom loves animals. Workers, neighbors and friends always helped us take care of the animals. In the neighborhood I was known to take in stray pets, pets that needed homes and Kill Shelter's like the ASPCA wouldn't think twice about ending their life because they weren't salable, this is what happened to my pets.

Companion pets extend an elderly person's life. Mom really was tricked to think if she gave up what she didn't want to she would get her daughter back. I have resided in jail 8 months till today. The ASPCA are lying crooks.

The animal charges are as ludicrous and fraudulent as a probation officer that calls in a burglary and is standing fire hiding in my living room. A minute later ~~at~~ I am innocently dragged out of the basement with no rights read, not even telling me what the fraudulent charge was and why 10 cop cars were sitting outside my house and my basement apartment and main apartment upstairs. Why was this false arrest so necessary? Why as a probationer was I targeted? That's illegal!! Against the Exclusionary Rule!

The court and the Probation Officer Amber Soba were always aware mom had companion pets. I had already asked legal counsel Gregory Kiriw (P) it was okay and he said "yes". I asked if I should move to Sullivan County to get

17

2 houses and he said no, it should be fine. I also spoke to the man with the white hair who sits to the right of Stephanie Zoro. And he said, if it is Senepets former company, it should be fine. Probation's Gregory Kozmin called upstairs to Stephanie Zoro & please come outside back to the court to clarify my living arrangement.

p1

The ASPCA, Kill Shelter workers and NYPP proceeded to destroy the house and terrorize the pets. Everything was thrown away in the house and pictures were taken to frame me and say I lived like that. I was threatened to be arrested every time I asked a question. The ASPCA Kill Shelter, however, gave a voucher for the pets and did the NYPP. Me and now we were just told we would never see the pets again. So the ASPCA, Kill Shelter and NYPP were openly admitting they were stealing the pets. There is actually a bigger scene of things. ASPCA, Kill Shelter and SPCAs all over the country team up with SPCA and falsely accuse Owners, Breeders, Show Dog people and Rescuers all of mistreating the animals as a reason to steal the animals which is what they are really, crookily and illegally doing. These publicity stunts for donations are placed all over the internet and newspapers using obvious paid off sources and the one in my case was District Administrator Richard Brown who ghost writes these press releases to destroy the lives of the innocent animal owners and sweet Furbabies. All ASPCA Kill Shelter Cues about is being a for profit fraud who uses these pets as "tax write off." And that is why they should be regularly audited. The most astounding thing to prove my point is that the ASPCA workers had no interest in asking me to spend loads of the pets when all I very free Bawl I said I took in special needs pets which meant these pets would need these specific needs attended to, to survive. Some pets had special diets and certain foods they would only eat. Some pets had gross habits that could really compromise



R2

Her KCAP they went attended to like please don't  
show sentimentality you will get a heart attack.

The pets were taken even though ASPCA kill shelter saw some  
old dogs and special needs pets were not salable and they  
probably would be killed by them. So the pets obviously were  
better off with me. The pets had heat light bar water etc.  
No neighbor or even complained about the pets or noise or  
smells so if there was a problem it would have been an issue.  
But there was NO PROBLEM till ASPCA kill shelter came in  
to steal the animals and create a publicity stunt for donations.

I hired a lawyer the next day Richard Rosenthal and employed  
him and paid him to get a non biased veterinarian on site to  
see the animals and Robert Reiman ASPCA kill shelter veterinarian  
blocked every other veterinarian and lawyer that I did work for.  
The ASPCA kill shelter from seeing these animals.

When pets are stolen by the ASPCA kill shelter they  
are never seen again because ASPCA kill shelter being led,  
working with and giving out bucks to the NYPD feel they are  
above the law and can steal anyone's property. Use  
Richard Brown's scriptwriter to write a press release  
offices and the innocent animal owner will perish.

The case involves fraud <sup>and</sup> corruption in the highest kind  
because ADA Michael Caffery is used to help charge  
and convict the innocent animal owner. His connection  
with Judges is influential. There has been no letter  
of judges for me and the same judges have come on my  
case and possibly given me a raw Deal.



93

Judge Pappe came on my case to give me a 300,000 bond when he was at my ~~att~~ the animal hearing. Judge McMahon was but he didn't want to sign off on a final bond seeing the case was corrupt so he gave it over to Judge Pappe who then corruptly said it was OK for 20 volunteers to get around on a breakin, that is against the law.

Judy was signed off on my grand jury (what 172 affidavits counts. I was married she signed off for her 142 counts and signed off on the grand jury till after I made the mistake of doing a bench trial and Judge Gura had a hard time of working with the District attorney. Out of 500 pictures in my house there was no picture of a beaten or starved animal but I was still charged with 350 low to very animals with no picture of a tortured animal. On my PREMIS and 356 low with no picture of a starved animal on my premises. Tons of pictures of food in my house all over the place moist, dry, treats, cold cuts and cooked food all over the house in bowls and lots of bowls of water, Litter boxes and wheelies and buckets and the for pets and per the too.

Workers helped me and ran with schedules for feeding walking dogs and litter box changes. We had schedules and files for the animals telling everything about them like a real caring rescue. There were no disposable cameras that is part of the "script" for the publicity stunts for donations.

## VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

4-1-19                      [Signature]  
 Dated                                      Plaintiff's Signature  
Elizabeth      Mary      Gant  
 First Name                      Middle Initial                      Last Name  
2419 Hughes St East Elmhurst NY 11370  
 Prison Address  
East Elmhurst      NY      11370  
 County, City                      State                      Zip Code

Date on which I am delivering this complaint to prison authorities for mailing: 4-3-19

## VII. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I understand that if I file three or more cases while I am a prisoner that are dismissed as frivolous, malicious, or for failure to state a claim, I may be denied *in forma pauperis* status in future cases.

I also understand that prisoners must exhaust administrative procedures before filing an action in federal court about prison conditions, 42 U.S.C. § 1997e(a), and that my case may be dismissed if I have not exhausted administrative remedies as required.

I agree to provide the Clerk's Office with any changes to my address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

4-17-19 \_\_\_\_\_  
 Dated \_\_\_\_\_ Plaintiff's Signature Grace Grant

Grace E Grant  
 First Name Middle Initial Last Name

25-44 8ndys L  
 Prison Address Hen

East Amherst Ny 11370  
 County, City State Zip Code

Date on which I am delivering this complaint to prison authorities for mailing: 4-18-19

# UNITED STATES CONSTITUTION

## BILL OF RIGHTS

### AMENDMENT ONE (1):

#### Freedom of Speech, Press, Religion and Petition

Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.

### AMENDMENT TWO (2):

#### Right to keep and bear arms

A well-regulated militia, being necessary to the security of a free State, the right of the people to keep and bear arms, shall not be infringed.

### AMENDMENT THREE (3):

#### Conditions for quarters of soldiers

No soldier shall, in time of peace be quartered in any house, without the consent of the owner, nor in time of war, but in a manner to be prescribed by law.

### AMENDMENT FOUR (4):

#### Right of search and seizure regulated

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

### AMENDMENT FIVE (5):

#### Provisions concerning prosecution

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use without just compensation.

### AMENDMENT SIX (6):

#### Right to a speedy trial, witnesses, etc.

In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

# UNITED STATES CONSTITUTION

## BILL OF RIGHTS

### AMENDMENT SEVEN (7):

#### Right to a trial by jury

In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury shall be otherwise reexamined in any court of the United States, than according to the rules of the common law.

### AMENDMENT EIGHT (8):

#### Excessive bail, cruel punishment

Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

### AMENDMENT NINE (9):

#### Rule of construction of Constitution

The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

### AMENDMENT TEN (10):

#### Rights of the States under Constitution

The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.

### AMENDMENT XIV

Passed by Congress June 13, 1866. Ratified July 9, 1868.

#### Section 1.

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

#### Section 2-4 [omitted].

#### Section 5.

The Congress shall have the power to enforce, by appropriate legislation, the provisions of this article.



P1

# United States District Court for the Southern District

Elizabeth Grant - Plaintiff

Grace Grant - plaintiff

Defendants

Lorraine Vultaggio, NY PD 115<sup>th</sup> precinct, ASPCA Kall  
Stetter, Robert Reisman, JASA, Lisa Mallos, ADA  
Nicoletta Cafferi, DA Richard Brown, Judge Stephanie  
Zaro, Monique Begg, Arden Soba, QHR Probation, Queens  
Supreme Court.

\* I have several requests from the court concern  
ing the two cases you consolidated together case  
2504/2016 and 2675/2018.

I hope to have my case seen before a judge  
who is impartial, fair, just and will understand the  
points concerning agricultural markets law 353 which states  
all pets or animals cannot be taken till after conviction.  
The evidence is not tampered and destroyed if taken.  
If taken before conviction as mine were the evidence is then  
illegal and cannot (the animals as evidence) be used in court  
case. Evidence illegally taken must be suppressed. My  
2504/2016 case should have been dismissed. Out of 500  
pictures taken in my house no animal / pet / evidence was  
harmed, injured, or broken 353 law was not anything I  
should have been charged for. 356 law pertains to watching

P2

animals for 12 hours straight outside with no food but you are not allowed to take them but you may queue them. According to the transcripts everyone saw tons of people food and animal food in bowls, boxes, cans, bags and people food cold cuts, fruits, vegetables and cooked food. So 356 how was not ruled either.

# I am happy with the Habeas corpus I can be relieved a Collaborated False conviction.

I am requesting the court take over all facets of my case. Queens Supreme Court has been quite biased and since ADA Nicoletta Caffern worked with NYPD's Lorran Vutaygo and ASPCA's Robert Reisman, and JAVAS Lisa Main to have me arrested as the answer to me thinking I could exert my right to property and asked for the pets back that were illegally seized - some I had for their lifetime - some 12-19 years old - a large abundance of them. I was told by trying to get the pets back which were still my property yet sold and killed as ASPCA. Kull shelter saw fit. Retaliation for trying to get my pets back and save their life was to be arrested 2 1/2 months later.

I am a member of the USA Caregivers alliance and the New York Caregivers alliance which funnels breeders, show dog people and rescuers like me are all falsely arrested and our property stolen. PUBLICITY STUNTS FOR DONATIONS TO RERLENDH ~~Inventory~~ is what is key here and the Richard Brown

P3

Ryft's his press release to do rock assassinate  
 the owner and then the owner's life is destroyed in a multitude  
 of ways not being able to find a job and of course  
 being harshly judged in a jury trial from all the derogatory  
 accusations that are not true yet lied about and overstated  
 in the Press Release.

\* I am asking the court to take over both of my cases  
 #2304/2016 and 2675/2018 because of the unjust  
 unfair bias way I have been treated by the NYPD  
 115th precinct who originally illegally stole the animals  
 and said to me and Mon we would never see them again  
 as a answer to where our legal wonder for the pets that  
 was owed to us was. Also the warrant was never shown  
 A warrant doesn't override 373 law so the warrant is  
 invalid. I

I am asking both cases be taken over in the  
 United States Eastern District Court because of  
 the collaborated bias I have received in the Queens  
 Supreme court. I am asking for a change of venue  
 from my cases. In reality as you see my cases  
 were built on the fact that the NYPD works with  
 ADA-Killster to illegal instigate and follow through  
 on an illegal warrantless search and seizure with trespassing  
 since Queens caused the problem illegally and were connected  
 to DA Brann, ADA Collieri and Judge Zeno they could.

easily try to validate the severe by charge assassinating  
heart putting all the blame on me. So the case should  
be tried in another district other than Queens who have to  
back up all the illegal things they have done and all the lies  
about my pets health, my house, and my mother. Only  
a separate District can fairly see this case because  
Queens will have authorities that will cover for each other  
and continue to use the veneer of falsely accusing me,  
overriding 373 law, I am not guilty the fact I have not violated  
353 or 356 law and continue to persecute me in extended  
the In jail for publicly fighting this case on Facebook  
daily for the last 3 years or more.

I was cyberbullied on Facebook by constituents of  
this case, I would be instant messaged things like  
"Did you violate your probation?" from someone I blocked  
named William Floyd over and over I would be asked  
"If I violated my Probation", being harassed all hours of  
the night.

I would like my Probation hold hearing  
done as soon as possible. I have been in jail &  
going on 9 months and the Queens Supreme Court has  
purposely against my constitutional Amendment  
& right to bail and no excessive bail and my cruel  
and unusual punishment is that Judge Stephanie  
has refused to run two Misdemeanors As a commitment  
the 353 and the 356 she wants to run then  
consecutive to give me the harshest punishment possible



p5

For two laws I did not even violate remotely.

The case is an appeal.

I have asked the Appellate advocate to do a stay motion to allow me to be released on bail or at least expedite my appeal which they have not done anything with since they got my case a year ago. I am asking this court if they can with the 25 2804/2016 Case

- 1) relieve me of the conviction.
- 2) Present a stay motion so I can be released on bail if releasing the conviction is not possible.
- 3) Do a sentence commutation to lower the sentence if the conviction can not be relieved so that since I have served a city year you can acknowledge that 353 and 356 should run concurrent and I can be released on my own recognisance for serving the city year already.
- 4) Please can this be done immediately. I have to get out and sell my house which is in foreclosure or at least get to foreclosure court because I have had the house in foreclosure for awhile thanks to the 25 04/2016 Case which has stopped my work all the arrest charges made Department of Health and Department of Education not be able to hire me so I couldn't make an income and my house fell into foreclosure thanks to the illegal search and seizures with conspiracy and my false arrests.

P7

Please read my trial notes for my case with Stephanie Zaro (Judge) and see I was not treated fairly and I will not be treated fairly unless this court steps in  
Judge Stephanie Zaro

- a) Strikes Everything I say in testimony
- b) Never stops brouhaha about the health of the pets and my horse and my care of my man and every vicious thing she says isn't true
- c) Won't allow me to act as counsel
  - a) I am not allowed to speak
  - b) I am not allowed to have papers on my Desk which were helping me tell my lawyer questions to ask and facts about the case
- d) I was thrown in jail for being a little late when Judge Zaro allowed mornings of ADA Cofferi and my lawyer ED Muccini 180 - Sitting at her Desk helping put together files of mine supposedly. In reality the court means ADA Cofferi and lawyer ED Muccini wanted to get paid a trial salary as I sat and did nothing and watched with no reason to be in the court because nothing was getting done.
- e) I love animals more than anything in the world. I made no money, preserving animals and all my money went to them. I made 1500 a week which I would spend as much as needed on Rose pets, Veterinary records, Banks statements of me and monies to show how much we spent on the pets and a petition of a hundred people many who were

get out of jail

- 1) Keep up  
with law suit
  - 2) civil complaints
  - 3) lawyers (call)
  - 4) type full kit  
friends only changes
  - 5) Ask for help  
get by mother lawyer
- 1) go research  
schools
  - 2) plan out with

pg

Neighbors were all presented to judge Zoro and she refused to look at any papers from me, letter from me and notes from me. Judge Zoro barely told me in court on the record if I understood she was never going to look at any papers from me and if I kept trying to give her papers to support my case she would put me in jail. She meant that. She has been impossible to work with on my own behalf. - Judge Zoro -

f. Judge Zoro ignored my refusal and has continued to keep a case. She has stated I will get maximum time or not even looking at papers from me that might help or explain the case or allowing me to explain myself without striking everything I say from the record.

# I implore the court to deny probation hold hearing if removing the conviction will not be able to happen although I hope it will.

The probation hold hearing has not been done purposely for the eight going on 9 months I have been in jail. Moore has heard the truth to pull apart this ridiculous story that I threw a probation officer over a barstool which never did. Moore has heard I have a foreclosure court which is why I didn't miss my appointment for Brekin psychology because I never had one and I was verifiably in another court. That is the answer to violation 3. Violator 2 states I had animals when in my business.



pg 8

apartment there were no animals. Probation officers  
 refused to go to my basement apartment and instead went  
 upstairs to my name's apartment breaking in and trespassing  
 and pushing her physically around with no warrant  
 and no papers. I signed although they lied to my 80  
 year old mom while terrifying her and pushing her  
 around the house and told her that they Araken  
 Soba and Monique Beggs had papers I had signed  
 when the court clerk wrote "Refused to sign" because  
 I forgot my glasses. The

Concerning the assault that never happened Monique  
 Beggs and Araken Soba yelled at my mom to get me  
 upstairs or they would never leave, threatening and scaring  
 my mom.

My mom screamed "Please Elizabeth help me, these  
 unidentified women just pushed me and broke in and  
 they say they want to have tell they say or, or else"  
 I came up and asked them to move furniture to get in  
 because I have to go to therapy.

Please remember 2 key facts:

- a) Monique Beggs and Araken Soba were not on  
 Araken's visit. They came for an illegal  
 warrantless search and seizure - from the  
 basement window. I could see cap guns and  
 plain clothes chiefs of police. Araken Soba and  
 Monique Beggs came to falsely arrest me. This  
 was well planned. Araken Soba and Monique Beggs

pg 40

also Care to steal Man's pets. The street was closed down the morning to falsely arrest me.

Monye Bey and Akele Soba lived upstairs Krayt as the protector of my room and I should not allow anyone to assault her.

\* Man Beyged Monye Bey and Akele Soba to go through the front of the basement apartment not to bring no upstairs rent trouble or to be near the pets but Monye Bey and Akele Soba were looking for trouble and to not just cause trouble to get me falsely arrested and put in jail for the duration of my sentence. Judge Zoro had picked Akele Soba and it is obvious from Peoddy Stephane Zoro's (judge) trial notes that she was well planning to put me in jail. At the end of the trial notes she even says "I will see you for a violation of probation," foreshadowing it. My arrest was a well-planned retaliation for going on five Boat and dealing up corruption concerning the NYPD 113rd precinct, Queens Supreme Court and of course the Always fraudulent, corrupt ASPCA, Kill shelter that uses these illegal search and seizures as publicity stunt for donations that they put in their pocket and a plenty inventory

P 110

by either reselling the pets taken or killing them so they can save their dollar kibble.

I do feel definitely in these cases

1) My first amendment - freedom of speech has been walked on! I was told during the trial by ADA Catteron and Judge Zano that IFT kept going on Facebook doxxing myself & I should end up in jail. Needless to say, nobody wanted me to tell my side of the situation, the truth that might shame everyone who did every thing illegal and bad to me my son my dad who died overnight after the seizure because he couldn't take the loss stress and anxiety of it.

2) My Fourth amendment Rights to property and privacy were also walked on. There was no probable cause for either case. Mom had told Lorraine Catappa to go away I'm fine but she broke in anyway because she had PLANNED AN ILLEGAL search and seizure with conspiracy. The same goes for Monique Begy and Andrew Soba who Planned an illegal search and

M

Service with cursing of man's pets. 630 am 10 cop cars, chiefs  
of police - August 29, 2018 - no probable cause - man asked these  
probation officers who was unidentified to leave, no neighbor called.  
Probation officers purposely went to man's upstairs apartment not mine  
- not my basement apartment - where there was no people or pets just  
he sleeping - getting up for work soon - no drugs, drugs - Living my  
low abiding life always - alone - getting ready to go to work as  
Educational Director of Little Red Riding Hood in Crown Heights  
Brooklyn, a job I loved and now the school is closed because  
the Educational Director was falsely put in jail.  
There was no warrant at 630 am for man's prison so the two probation  
officers that never identified themselves to man didn't belong or  
prison is in the first place. No probable cause. Never  
a 311 call from neighbors of absolutely any problems  
trouble, smell or, noises coming from my house and if  
the case was true which it wasn't or isn't a neighbor  
would have complained in reality.



to  
only  
[Handwritten notes and diagrams on lined paper, including a vertical line and several circles.]

I -  
Brown -  
K -  
B -  
B -  
M -  
SP -  
SP -

Thank u arrest

17/2

\* Armed and Fire was definitely walked on - The animal case has been redone twice and the second illegal search and seizure is now absurd then the first one. The animal fire state. No person shall be subject for the same offense to be twice put in jeopardy of life or limb also nor be deprived Life, Liberty or property without the Process of Law; nor shall private property be taken for public use without just compensation.

The ASPCA K9 shelter should outgrow the pets Bred (which is impossible because the minute they get them, they sell them and kill whoever isn't salable knowing they will characterize assassinate the owner using Richard Brandt's press releases) and get them falsely arrested using ADAS like Nichollette Cafferri and select Judges Roy Brown Bar pocket to falsely convict the owner in an effort to steal custody of the pets and deprive the owner of Life Liberty and the pursuit of happiness which (the happiness is obviously the pets they love!) Yes - just compensation. Even in 373 and 374 against that market star it says the owner must be compensated for the pets so do to the illegal search and seizure with Massachusetts ASPCA. Owe retribution for the pets which I have put forward

PB AB

Careney - never toward profit - Like the ASPCA - "for profit"  
 Kill shelter - as a rescuer I never, ever, ever made money off  
 the animals I put money into the care of the animals that  
 is the humane difference between my sincere care for the  
 animals AND ASPCA's fraud of stealing animals in the  
 hopes of publicity and donations trying to put their pocket  
 the CEO makes 800,000 a year so I can just imagine  
 what Robert Reinson, Kill shelter veterinarian makes as a  
 cutback for not allowing another Non Biased veterinarian  
 on site to give an accurate depiction of the pet's health.  
 So, Robert Reinson can write repetitive bills which  
 state any thing about the pet's health no one can  
 check on it. He can become a millionaire. Just writing  
 bills for work that is never done and no one can check on -  
 that is an amazing scam isn't it? And the donations  
 just keep pouring in. Meanwhile I am in jail and I  
 made no money off the pets and Robert Reinson should  
 be in jail for tax evasion because the pets are taken as  
 "tax write offs", not because ASPCA cares that they have  
 terminated older and special needs pets that they are

P417

going to "kill" anyone because they are not available. These dead and special needs pet will just be used as props reasons to soak the public with tearjerker Sarah McElbighen from the Angel videos of weepy pets to get cell phones out of people to put in their own pocket. I want Robert Rees on and all involved in this case whether Bank accounts seized and audited for bribes.

I read about Ringley Brothers case with ASPCA Kull's Letter and they were ASPCA Kull's Letter that is pretty hundreds of thousands of dollars in the bank account of their pop waitress, Toni Rider. Day or love R's hoodlums and fraud. unbelievable so I do believe everyone involved in my case should have their Bank accounts audited from the past 3 1/2 years of my case and my estranged brother ED grant who has tried with JASA to railroad my mom to a hospital and using her to steal her share of the house and worked with JASA cruelly to try to get rid of mom. Henry ED put a "no resuscitation on Dad" and went to every bank in Forest Hills. Next Day I caught them on 108th St and Austin Street trying to get my fathers



P15

bank account with his death certificate, pretty loathsome, right! My Brother is not a credible witness he wanted the house sold to profit from it. My Uncle Red Yang and as a favor she put me and my Brother Ed Grant on the deed but it was a terrible mistake because Ed has been trying to cruelly and viciously get rid of me and son and get our share of the house. He has the keys Ed Grant and no one else would like to get an order of protection against him because we are scared of him!

- Amendment 14 - This constitutional right declares No! Shall any state Deprive any person of life, liberty or property without Due Process of the law; nor deny any person within its jurisdiction
- My life has definitely been deprived by being thrown in jail for offenses I am not guilty of.
- My Liberty has been deprived by being falsely incarcerated so I can't go to foreclosure court, or my NYPD leaving. If I lose my house I must retribution for that because I have served 16 city years by now and I should be let go with 2 million dollars in

Appeal I am not guilty of. The two ms doesn't could  
 run concurrent then I would be the same but unduly  
 harsh, bias, prejudice on my case Judge Stephanie two to prove  
 my point how harsh and spiteful she is, is running the case  
 to spitefully keep me in jail so I don't get to become out  
 what she is aware of because I had notified Judge two of  
 the urgency of getting out of jail and getting to become out  
 Court and attending to my 80 year old mother.

I need a non biased judge to step in and run my  
 case fairly and justly!

Yes I should not be denied my property so who do  
 ASPCA kill's letter think they are by just using and illegally  
 taking pets that don't really be false. The animal was not  
 illegal. No neighbor had a problem. I could live with  
 with them or tried for more hours for them which was bad  
 but ASPCA kill's letter rectified the matter in their own  
 sickness by just killing the ohl's and spread needs pets  
 which weren't salable and I found out breeding my cats  
 and selling their kittens for months. The pets were mistreated  
 so they were not pregnant with me. I separated males and  
 females.

① Mother did not  
give up pets willingly

②

p17

ASPCA Kullskelt threw the pets on top of one another almost  
 5 or 6 cats to a cage to fight or impregnate each other. No care  
 for the health and wellbeing of the pets at all.

The docks with the pets in them stood open for hours so  
 the pets could freeze to death. He and now stood in the 20 degree  
 weather for hours in slippers with no hats and gloves on  
 January 28, 2016 with no humanity from the ASPCA Kullskelt  
 or the NYPD at all!!

Award #8 has definitely been abusive. No bail for  
 2 years or 9 months then when I do the city you unduly  
 harsh Stephen Gore says to do one year more on laws  
 I didn't violate. But the appellate court has not taken  
 touching my case and refuses unlawfully to do a stay now  
 for bail or even stay my case till this summer. I have  
 been a law firm but in a complaint to the appellate court about  
 this. But if the court could remove the conviction that  
 would be the best!!

I have been Denied bail on a record for a Probation  
 hold Henry. I have been Denied that would incur my  
 innocence and violations so I could be released on bail



P18

Excessive Bail is on the other case which should be loved  
 I need the truth to be heard about the situation I  
 am being falsely accused of on the production  
 hold hearings and I would like that Done Right  
 away!! My innocence has not been heard on the cases violations  
 at all.

FAILURE of AOA M. whether to provide ~~ALL EVIDENCE~~ <sup>ESSENTIAL</sup>  
 At hand by OAs office including matching ~~EPL 240.10 - 240.10~~ <sup>violated by Queens</sup>  
 Property Clerk Invoice <sup>Supreme</sup>  
 I request the court to ~~to~~ provide all evidence <sup>cont</sup>  
<sup>ADG</sup>  
<sup>Nicole's</sup>  
<sup>Cuppen</sup>

Especially favorable evidence like the Queens

Supreme court. I am requesting

(1) Body camera footage of Anabel Soban and

Monique Berry. They were for a @ laboratory  
 search and serve and false arrest with 10

cop cars and chiefs of police for a huge sum

like that for how they were wearing their Body  
 Cameras but it will show the truth and

Monique Berry and Anabel Soban already perjured themselves

in court during the Grand jury. Monique Berry saying  
 she was assaulted when she wasn't and Anabel Soban

on the 2nd floor not the 3rd floor witnessing

p(9)

Anything.

The Body camera footage will show that Monique Benz was not injured at all that is why she does not want to submit it.

② Illegal pictures taken by Araden Soba and Monique Benz

Benz is my house, of my house and my name pets!!

My son was pushed into the house and almost knocked down by Araden Soba and Monique Benz. ~~patronizing~~ ELDER ABUSE. Pushing all over the house to get these illegal pictures taken. Mon was stressed and terrified by two unidentified women (pushing Ben way into her house after breaking the front window and the door and hot knocking him). They were thinking these women were paparazzi or news people. Camera people they say she said they provided a forcible entry into the house and into her house pushing her all around the house to take pictures. They do not want to produce in court because when the pets were bad lot of food and looked fine. ~~And~~ the pets looked healthy and fine that is why they Araden Soba, Monique Benz and APT officers

p20

don't want to produce his favorable evidence.

③ ADA Carrierr has to produce the Papers Monroe Benz and Andrew Sohn said I signed because they are lying and I signed nothing.

④ Warrant - I want to see the warrant to see if there are any mistakes in it. Also in reading the warrant if it is 640 I cannot override the 373 law that states pets are not taken till after conviction. Obviously the Pets as evidence will be turned and destroyed. Evidence is Illegal Because all signs are illegal so according to the Exclusionary rule the Pets should be left out of the case or suppressed and this evidence would be inadmissible. I hope that I can see this warrant because the ADA Carrierr is hiding it due to Monroe Benz and Andrew Sohns Malicious Prosecution

damned against the PL19500.

(CPL 190.05-190.90) I was forced to testify before the grand jury

By my lawyer working with ADA Carrierr Wyatt Gibbons who promised me I could see the record December 17th and then December 19th told me I was already indicted.

CPL 40.20

This seems like a Double Jeopardy issue because the case is identical to the first false charges of animal abuse 383 and 356 last time that weren't true and this time even more aren't true.

CPL 30.30

The Speedy trial issue does indeed try to Regain my Life Liberty and Property

The warrant issues of CPL 690.05-690.55 is a problem with the search because 373 has states the search and seizure must supposedly occur till after conviction

The arrest was illegal because my rights were read by probation officers or the police CPL 120.10 & 120.90 My constitutional rights were violated I was abused and unlawfully treated by the police and talked about my house and new pets without having my Miranda rights read as you will see in a court that state I should be told



822

Everything I would say could and would be used against me

I have been denied the following hearings

- ① a Mapp hearing to discuss the illegality of the search and serve with a writ on the part of the APDA Kullback and the NYPD.
- ② A Huntley hearing to discuss how statements should be suppressed if they were illegally obtained in my case as they were
- ③ A Winny hearing should be done to establish if the arrest was legal or not legal, my rights and Miranda rights were not read and a discussion of why I was removed from the house and charges was not told to me or the I do not think the arrest was legal. Just watch the 11th precinct VIDEO and you will see!!
- ④ The case definitely has double jeopardy issues with a phoned fake arrest concerning a second illegal, warrantless search and seizure!! CPH 40,20

CPL 240.10 - 240.9 was violated also by the ADA officers because she refused to provide to me

- 1) the warrant
- 2) Body camera footage of Arulan Sekan and Monique Beyy
- 3) <sup>All</sup> Illegal pictures taken in and of my house and home pets.
- 4) Anything they said I signed

All favorable evidence must be submitted to the District Judge. Just District Judge submitted as a video court by ADA officers does what she wants where she wants and never ABIDES by the Rules.

ADA Officer is on the record in my <sup>court</sup> case saying: From the now false arrest. She is saying:

- ① My son was trying to stop Monique Beyy Arulan Sekan from taking pictures. Yet ADA Officer refused to submit favorable evidence of pets that were fine and healthy chubby pets without a scratch.
- ② Monique Beyy and Arulan Sekan saw more food in the afternoon in the morning. So if there was more food

pry  
 In the afternoon Ben in the morning Ben the pett legally  
 did not need to be seized. Ray had ~~read~~ and under conviction  
 and 356 and 353 law was not strictly violated at all  
 2504/2016 and 2675/2018 BOR should be dismissed.

Neither case is true nor the accusations happened by  
 one hearsay and elaborate lies helping to characterize assessment  
 to get their publicity stunt for their using my family  
 well so called to exhort the people - my long friend  
 animals as animals that did not need to be taken legally  
 My case involves fraud and corruption!

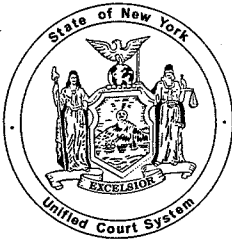
ADA Nicoletta Coffari has ruled this case since June 2016  
 when she got the job. She has done countless 730 and 3905 and all  
 at one court date tried to get my mother taken by Adult Protective  
 and we put in a verbal petition. She has worked on the to try to  
 paint a picture of her as a mental patient. Luckily Judge Tran was a  
 fair smart judge but Judge Zuro is a replica of ADA Nicoletta  
 Coffari. And it is obvious from their by invalidity speedtest that  
 they have the same scriptwriter as DA Brown has for his Defendant  
 of Chwack press releases create a scenario of lies!

ADA Cafferi ever wrote to the State Department of Education to try to get my licenses renewed. She is hell bent on winning and destroying my life and soul. She has already had many of my pets destroyed saying off for their death certificates and throwing them in the garbage like I had buried. Pilots already bought for these pets at Abington Hill cemetery. I couldn't even get to bury these pets that were unnecessarily taken from my home where they had lived long lives of up to 19 years of age. I respected my pets in life and death unlike ASPCA Kill Shelter and ADA Nicoletta Cafferi who has the nerve to authorize the unnecessary deaths of my animals !!!



Exhibit 1

Supreme Court  
of the  
State of New York



JOSEPH A ZAYAS  
ADMINISTRATIVE JUDGE  
CRIMINAL TERM  
QUEENS COUNTY

CHAMBERS  
125-01 QUEENS BOULEVARD  
KEW GARDENS, NY 11415

April 4, 2019

Ms. Elizabeth Grant  
IND# 2675/2018  
1919 Hazen Street  
East Elmhurst, NY 11370  
B/C # 4411805772

Dear Ms. Grant:

I have referred your letter to Judge Stephanie Zaro, who is currently presiding over your pending case. As the Administrative Judge, I cannot intervene with her judicial determinations or attempt to influence those determinations in any way. For inquiries regarding the pursuit of appellate remedies to which you may be entitled, or other legal guidance, please contact your attorney, as I also cannot provide you with legal advice.

Sincerely,

Joseph A. Zayas  
Administrative Judge Criminal Term  
Eleventh Judicial District

cc: Honorable Stephanie Zaro  
Criminal Term, Queens County  
125-01 Queens Boulevard  
Kew Gardens, New York 11415

DARA RUIZ - People - Direct

102

THE WITNESS: Okay.

THE COURT: You may inquire.

DIRECT EXAMINATION

BY MS. CAFERRI:

Q By whom are you employed?

A The ASPCA.

Q By how long have you been employed?

A It will be five years in August.

Q In what capacity are you employed by the ASPCA?

A I am a senior manager of community engagement.

THE COURT: Senior manager of what?

THE WITNESS: Community engagement.

THE COURT: Thank you.

Q And as, the senior manager of community engagement, what exactly

are your responsibilities?

A I receive four community engagements, oversee coordinators, responsible for the outreach of your program as well as the casework.

Q And can you describe for the Court what the outreach entails or

covers?

A We work with the community to let them know the services we provide for people and their pets in order to keep pets and people when appropriate together and animals out of the shelter.

Q What services do you provide?

A Spay and neuter and wellness checks, we help reduce populations for people if they need to give up animals and they are overwhelmed.

gjn

DARA RUIZ - People - Direct

103

Q Do you also do referrals to ATP?

A Yes. We work with -- we also work with human service providers as well so we can make referrals to the pet owners if they need additional support.

Q Could you tell the Court what additional support would cover?

A If a home needs a deep clean, we will refer the case to APS; or if they need any other therapeutic services.

Q And in the instance where a home may need a deep cleaning, what does the APS for that?

A We refer the cases to APS so that they can go in and assess the home.

Q And if the home requires a deep cleaning, what would your role from the ASPCA be?

A So we can help remove the animals for a deep clean and then bring them back.

Q I am calling your attention to -- who are the people that you were working with? Who do you supervise; could we get their names?

A Evan Dunn, Discadora Perez, Katherine Goode, Raphael O'Neill and Marica Aboff.

Q Thank you.

Calling your attention to January 8, 2016.

Were you working there?

A Yes.

Q On that date, could you tell the Court whether or not you had an occasion to be at 25-44 82nd Street?

gjn

DARA RUIZ - People - Direct

104

1 A Yes.

2 Q Is that in the County of Queens?

3 A Yes.

4 Q And could you tell the Court what, if anything caused you to go

5 there on that date?

6 A We received a referral from the 115 precinct from Officer

7 Vultaggio.

8 Q And what was the nature of that referral?

9 A It was a possible neglect case involving animals.

10 Q And did there come a point in from time on that day that you in

11 fact responded to 25-44 82nd Street?

12 A Yes.

13 Q And who if anyone did you go there with?

14 A I went with Raphael O'Neill and Officer Vultaggio.

15 Q And would you tell me approximately what time if you recall when

16 you got there?

17 A I believe it was around 3 o'clock, between 3:00, 3:30.

18 Q Upon arriving at the location, could you tell the Court what type

19 of building is at that address?

20 A It's a single-family home with a basement and a second floor.

21 Q And as you got to that location and approached that building,

22 could you tell the Court if anything you observed or smelled at that time?

23 A We walked up to the porch and we knocked, me, Raphael and Officer

24 Vultaggio. Ms. Grant came to the door and was hesitant to come out at first

25 but stood behind the door and Raphael and I let her know where we were from,

gjn

DARA RUIZ - People - Direct

105

1 we were from the ASPCA, that we were here to help her if she needed any

2 services for her animals; food, vaccines, spay neuter. At that time she

3 stated that she didn't want --

4 THE COURT: Don't tell us what she said.

5 THE WITNESS: Okay.

6 Q Without telling us what she said, could you tell us whether or not

7 she accepted any of your services?

8 A She did not.

9 MR. MUCCINI: Objection.

10 THE COURT: I'll allow that.

11 Q And could you tell the Court how Ms. Grant appeared at that time,

12 how was she dressed?

13 A She appeared disheveled and it looked as if she had either like

14 cat feces or something on her shoes. She appeared dirty.

15 Q Were you able to see inside the house at that time?

16 A We could see a little bit into the front hallway but we couldn't

17 really see anything or see any animals although we could smell animals.

18 Q Could you tell the Court what the smell was like?

19 A It was a very strong odor of feces and urine.

20 THE DEFENDANT: What?

21 THE WITNESS: Feces and urine.

22 THE COURT: Feces and urine.

23 Q Now after offering the services to Ms. Grant, and the person you

24 are referring to as Ms. Grant, do you know which Ms. Grant that is?

25 A Sorry. The mother.

gjn

Reference! the below to include but NOT limit to!

Revised in Berlin  
ASPCA

- ① Any Warrant issues while requesting Copy of Warrant & Affidavit Support
- \* (a) Search CPL 690.05 - 690.55
  - (b) Arrest CPL 120.10 - 120.90
  - (c) Video Surveillance CPL 700.05 - 700.20
  - (d) Eavesdropping (Audio) CPL 700.05 - 700.70
  - (e) Pen + Trace (Phone) CPL 705.00 - 705.35

- ② Any Failure to Provide DISCOVERY ALL Evidence currently at hand by DA's Office (including MATCHING Property Clerk Invoices & Lab Report)

- ③ Any Denial of Necessary Hearings!
- \* (a) MAPP (Search & Seizure Issue)
  - (b) Huntley (Statements claimed to be made by ANY Defendant to Law Enforcement)
  - (c) Wade (Method to Acquire Witness: Legal or not)
  - (d) Dunaway (Arrest legal or not)
  - (e) Sandoval (Previous Convictions)
  - (f) Molineaux (Uncharged Bad Acts)

- ④ Excessive or Denial of BAIL / Release Reverses!
- \* (can quote U.S. Constitution Amendment 8)

- ⑤ Any Prosecutorial Misconduct / Overzealous Prosecutor
- Malicious Prosecution - Official Misconduct

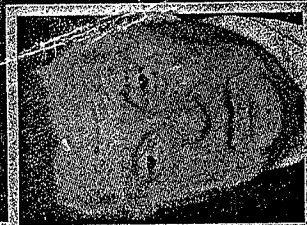
- Speedy Trial Issue (CPL 30.30) PL 195.00  
Schedule to Defraud Defendant of Life, Liberty + Property

- Any Denial to Testify Before Grand Jury CPL 170.05 - 170.90
- Any Double Jeopardy Issues CPL 40.20
- Unauthorized Unsealing of Records (CPL 160.50)



BY ESHA RAY  
NEW YORK DAILY NEWS

Holding signs saying "Justice for Queens now" and "DA Brown, End mass incarceration," members of local advocacy groups spoke about the need for change in the borough. "Richard Brown has been in office since 1991 and is a relic of the tough-on-crime era," said Andre Colon, of the Rockaway Youth Task Force. While other New York City district attorneys have acknowledged problems with the system and even changed



ities are being targeted while powerful people are not being held accountable," Colon said. "It's time for this harmful rhetoric to end."

Carl Stubbs knows the insidemeanor charges, and often punishes poor defendants by requesting excessively high bail. Vulnerable commu-

"Now I look back and think about all my friends and family who were criminalized, when what we really needed was resources and investments in our future."

The group chanted “Take down Dick Brown” and “What do we want? Justice for Queens! When do we want it? Now!” as they took the mic to share their own stories.

Brown fought back against claims that he's a harsh prosecutor. "Not a single defendant from Queens currently on Rikers Island is being held solely for a misdemeanor marijuana or farebeating charge—NOT ONE," he said.

DAILY NEWS NYDailyNews.com

# Push to tighten truck-rent rules

Truck rental companies would be required to verify customers' identification as part of a bill that will be introduced Wednesday, the one-year anniversary of the West Side bike path terror attack that killed eight people.

City Councilman Donovan Richards (D-Queens) said truck renters can exploit a practice that allows customers to pick up the keys to a truck at a kiosk or by using an app.

In theory, a terrorist could arrange for someone else to pay for the van, then pick up the keys without being required to show ID.

The bike path suspect, Sayfullo Saipov, rented his pickup truck from a New Jersey Home Depot. After the terror attack, the NYPD and other authorities looked at ways terrorists could rent vehicles while concealing their identity.

Under terms of the bill, anyone renting a van or SUV that can hold at least 10 passengers or weighs at least 6,000 pounds would have to show their ID to a company employee. **Rocco Patacandola**

# QUALITY DENTURES

# DONATE YOUR CAR

On the other hand, if the police suspect that criminal activity is going on inside the house (such as the sound of a fight or the smell of marijuana smoke), they might be able to enter without permission, though this may depend on the circumstances.

### Can the Police Search my Car if it's Been Seized or Towed?

Yes- if your car has been impounded, the police may conduct a search of your car, including any closed containers found within as well as the trunk area. This is true even if the police obtained your car after it was stolen. However, the search must follow fair and reasonable standards. Police may not pull you over and tow your car simply to conduct a search.

### What happens if Evidence is Illegally Searched or Seized?

If evidence is illegally seized, it cannot be used as evidence in court. This is known as the "exclusionary rule", which states that evidence obtained from an illegal search must be excluded from evidence during trial. One of the most common applications of this rule is where the police fail to obtain a search warrant before conducting a search and seizure.

### Do I Need a Lawyer if I Have and Search and Seizure Questions?

Search and seizure must be conducted according to strict standards that the police must follow. If you have any questions regarding the search and/or seizure of your property, you may wish to contact a criminal lawyer for advice. An experienced criminal attorney in your area can provide you with legal advice and can represent you in court if necessary.

*Case should have been Dismissed Charges Dismissed  
Evidence & Statement  
Suppressed*

*Mark  
Ashburn*



## Prosecutorial Extortion

Extortion is a kind of threat. A threat that's so bad, it's criminal. For a threat to be criminal extortion, it needs to be of a kind to make someone do something against his will, that's adverse to his own interests.

Threatening to kill a child if the parents don't give you money, for example, would be extortion. So too would be a civil lawyer's threat to file criminal charges — even if such charges are warranted — if the other side doesn't pony up with a settlement. Another example is when a government official threatens to use his position to do something he's perfectly entitled to do in the first place, unless the victim does him a favor first.

There are lots of examples of extortionate behavior. But these last two examples demonstrate that the threatened action doesn't itself have to be against the law. The civil lawyer could go ahead and press criminal charges, but threatening to do so is against the law. Ditto for the government official whose threat to merely do his job is a crime. The point isn't whether the threatened action is itself criminal, but whether the threat causes such fear as to override someone's free will.

This is basic stuff. Not exactly cutting-edge law here.

So how come nobody seems to have litigated the Queens (New York) District Attorney's practice of extorting speedy trial waivers from defendants?

=====

In New York, there are a few different kinds of speedy trial rules. One is the classic constitutional speedy trial rule, also embodied by statute in CPL §30.20. It's almost never used, because before any delay is likely to have impaired the defense in a typical case, CPL §30.30 will have kicked in. That one, in a nutshell, calls for dismissal of a felony after roughly 183 days have counted against the People since the initial arraignment. Delays asked for or consented to by the defense don't count. A third analogous rule is the "speedy indictment" rule of CPL §180.80, which says a defendant who hasn't made bail must be indicted within 144 hours of his arrest, to the minute, or else he must be released from custody on his own recognizance.

CPL §§30.30 and 180.80 are there to make sure the prosecution does its job. If a case has had more than 6 months of delay, and it's the People's fault, then the prosecution didn't do its job, and the case gets dismissed. If the People haven't gotten their act together to secure an indictment against someone who's sitting in jail, and this goes on for 6 days, then the prosecution didn't do its job, and the defendant gets released for the rest of the case.

The policy is simple: we don't want people rotting in jail while waiting to be formally accused of a crime, and we don't want people's lives on hold forever while awaiting trial.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF Queens

THE PEOPLE OF THE STATE OF NEW YORK,

-AGAINST-

Emmett Gunt

DEFENDANT.

**NOTICE OF MOTION  
FOR  
RECUSAL  
PURSUANT TO  
JUDICIARY LAW § 14**

Docket No.:

Indict No.: 2573 2018

NYSID No.: 19130974

PLEASE TAKE NOTICE, that upon the annexed affidavit of Emmett Gunt, duly affirmed the 26 day of February, 2019, and upon the indictment and all the proceedings had herein, the under signed will move this Court Queens Supreme Court thereof, to be held at the courthouse located at 125-01 Queens Blvd, county of Queens, on the Monday day of March, 2019 at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel can be heard for an order granting this request that the Honorable Justice Stephane Zaro, RECUSE him/her self from these criminal proceedings pursuant to New York State Judiciary Law, sections 14, and any further relief as the court may deem just and proper.

Yours, etc...

Emmett Gunt  
DEFENDANT



OFFICIAL NEW YORK STATE PRESCRIPTION

KEVORK GEORGE BOYADJIAN MD  
LIC 180550  
NPI 1316054539

75-06 ELIOT AVENUE MIDDLE VILLAGE, NY 11379 (718) 639-4258  
33-54 83RD STREET, H01 JACKSON HEIGHTS, NY 11372 (718) 899-8558

PRACTITIONER DEA NUMBER

Patient Name GRANT, GRACE Date 10/16/18

Address \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_ Age \_\_\_\_\_ Sex ☒ M ☐ F

Rx Although Mrs Grant tries to stay independent her dtr Elizabeth has been a good caregiver to her

LER Preferred Language

Prevent medication errors: Please ☒ back of prescription

Prescriber Signature X [Signature]

MAXIMUM DAILY DOSE  
(controlled substances only)

THIS PRESCRIPTION WILL BE FILLED GENERICALLY UNLESS PRESCRIBER WRITES "DAW" IN THE BOX BELOW

REFILLS

☒ None

Refills: \_\_\_\_\_

0SX6J0 66



PHARMACIST  
TEST AREA

Dispense As Written

JOHN - Case Inquiry

Trial appearance

700066/2018E

NATIONSTAR MORTGAGE LLC  
E-RES FORECLOSURE FSC ELIGIBLE  
JEREMY S. WEINSTEIN

GRANT, EDMOND ETAL  
RESIDENTIAL FORECLC  
ACTIVE PRE

LAST	09/20/2018	FORECLOSURE CONFERENCE PA	
004	07/31/2018	FORECLOSURE CONFERENCE PA	FSC - CONTINUED (U)
003	06/28/2018	FORECLOSURE CONFERENCE PA	FSC - CONTINUED (U)
002	05/24/2018	FORECLOSURE CONFERENCE PA	FSC - CONTINUED (U)
001	03/20/2018	FORECLOSURE CONFERENCE PA	FSC - CONTINUED (U)

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF Queens

RECEIVED  
SDNY PRO SE OFFICE

2019 MAY -2 PM 1:09

THE PEOPLE OF THE STATE OF NEW YORK,

S.D. OF N.Y.  
**NOTICE OF MOTION  
FOR  
BAIL APPLICATION  
PURSUANT TO  
CPL § 530.40**

-AGAINST-

Elizabeth Gout

DEFENDANT.

Docket No.:

Indict No.:

NYSID No.:

26/75/2019  
19130977M

2405/2016

PLEASE TAKE NOTICE, that upon the annexed affidavit of Elizabeth Gout, duly affirmed the 25 day of April, 2019.

and upon the indictment and all the proceedings had herein, the under signed will move this Court Queens Supers Court thereof, to be held at the courthouse located at 125-01 Queens Blvd, county of Queens, on the 4 day of June, 2019, at 9:30 o'clock in the forenoon of that day or as soon thereafter as counsel can be heard for an order granting defendant

**APPLICATION FOR BAIL** pursuant to New York State Criminal Procedure Law, sections **530.40**, and any further relief as the court may deem just and proper.

Yours, etc...

Elizabeth Gout  
DEFENDANT

RECEIVED  
SDNY PRO SE OFFICE

2019 MAY -2 PM 1:08

S.D. OF N.Y.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF Queens

THE PEOPLE OF THE STATE OF NEW YORK,

-AGAINST-

Elisabeth Grant

DEFENDANT.

**AFFIDAVIT IN SUPPORT  
OF MOTION FOR  
BAIL APPLICATION  
PURSUANT TO  
CPL § 530.40**

Docket No.:

Indict. No.: 2905/2016 26751

NYSID No.: 44 2018

STATE OF NEW YORK }

COUNTY OF Queens } s.s.: 13162-2668

I, Elisabeth Grant, being duly sworn, depose and state:

I am the defendant in the above-entitled action, and am personally familiar with the facts and circumstances herein stated.

I am a detainee presently being detained at 1919 Hazen St Rose M  
listed hereunder the mailing address of 1914 Hazen Street, Rikers Island, East Elmhurst, Sage  
New York 11370, herein considered the County of the Bronx.

Whereupon, although I am personally familiar with all of the facts and statements hereinafter stated to the best of my knowledge, information and belief, I am a layperson in matters of the law and seek this Court's indulgence for errors, defects and faults pursuant to sec. 2101(f) of the Civil Practice Law and Rules.

On the 29 day of August, 20 18 a complaint was filed in the Criminal Court of Queens County, charging the said defendant with the



offense(s) of Felony C  
 in violation of New York State Penal Law, section(s) \_\_\_\_\_.

Arraignment of the defendant on the above-mentioned complaint took place in this Court on the 29 day of August, 2018, and defendant was held for Grand Jury proceedings. Subsequently, defendant was indicted for the aforementioned charges and was arraigned upon said indictment in Supreme Court, Queens County, on the 14 day of December, 2018.

That on the 29 day of August, 2018, the Supreme Court of Queens county, denied the defendant's application for recognizance or bail and directing that he be retained in custody by the Department of Correction.

Defendant maintains that the denial of bail was and is a violation of the Eighth and Fourteenth Amendment of the United States Constitution.

Defendant maintains that bail is fixed to ensure one's appearance at each scheduled Court appearance.

Defendant is indigent and cannot possibly afforded a bail in excess of \$ \_\_\_\_\_.

Whereupon, this Defendant respectfully requests the Court to grant this motion for **BAIL APPLICATION**, pursuant to New York State Criminal Procedure Law § **530.30** and the laws, statutes, and arguments annexed herein.

STATEMENT OF FACTS

I have been Denied my  
prohibition had been  
for 8 months and now  
my doctor wont  
to do it at  
all!

Please help I need to be released

The judge has been saying my doctor  
consent not consent  
She is giving a exemption to  
just I have been treated  
Hardly + Unfairly  
Please help

I have not been given a written order  
about Brutal and I am in jail  
I am also 1/1

The Defendant respectfully requests the right to make any and all further motions as may be necessary as a result of information and disclosure from the granting of the requests made herein and/or information received from any record within a reasonable time.

No other application for the relief sought herein has been made to this or to any other court.

WHEREFORE, this defendant respectfully prays that an order be issued granting this motion pursuant to the aforesaid sections of the New York State Criminal Procedure Law, and taking into consideration the facts and argument annexed herein, or, in the alternative, an order be issued granting partial relief, or whatever relief the Court sees and deems fit and appropriate to insure the swift and proper administration of justice.

Yours, etc...

  
DEFENDANT

Sworn to before me this

\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
NOTARY PUBLIC / COMMISSIONER OF DEEDS

*My house in  
foreclosure  
has to  
go at  
a real  
auction!*

CORRECTION DEPARTMENT CITY OF NEW YORK  
60-DAY RECLASSIFICATION FORM (4100B)

Check Only One: ☐ 60-Day Reclassification ☐ Updated 60-Day Reclassification

Inmate's Name: GRANT, ELIZABETH  
BK&CS#: 4411805772

Date: 17-Apr-201  
NYSID#: 07413097M

Classifying Officer's Initials: \_\_\_\_\_ Shield #: \_\_\_\_\_

I dispute the indicator(s) that I have checked below:

<u>Classification Indicators</u>		<u>High Charge</u>	<u>Sc</u>
1. ___	Severity of High Current Charge/Offense:	110-120.08	
2. ___	Severity of High Prior Conviction Within 7 Yrs:		
3. ___	History of Escape: <7 Yrs Charge Score >7 Yrs Charge Score		
	Serious:		
	Minor:		
4. ___	Institutional Conduct Within 7 Yrs:		
5. ___	Current Age: 50		
6. ___	Current Security Risk Group Membership: N		
7. ___	# Disciplinary Convictions Within 60 Days: None		
8. ___	Most Serious Discipl. Conv. Within 60 Days:		
9. ___	Satisfactory Participation in an Approved Activity #1:	#2:	

Reclassification Custody Level Score (Items 1-9) Total Points:

Scored Custody Level

X Minimum (6 or fewer pts)    \_\_\_ Medium (7 - 12 pts)    \_\_\_ Maximum (13 or more pts)

## Overrides

<u>Non-Discretionary - Min Custody Restricted</u>	<u>Discretionary Override - Higher Custody</u>	<u>Discr. O</u>
<u>Felony Detainer or Warrant</u>	<u>Known Management Problem</u>	—
<u>State Ready</u>	<u>Current Escape Threat</u>	Conduct
<u>State Prisoner</u>	<u>Serious Violation Threat</u>	—
<u>Homicide (Current Charge or Prior Conv)</u>	<u>Prior Arrest Record More Severe than Scored</u>	Misconduct
<u>Kidnapping (Current Charge or Prior Conv)</u>	<u>Current Offense more Severe than Score</u>	—
<u>Felony Sex Off (Current Charge or Prior Conv)</u>	<u>Current Mental Health Status</u>	as Scored
<u>Escape Threat (Current Charge or Prior Conv)</u>	<u>Contraband Visit</u>	—
<u>Security Risk Group Member</u>	<u>High Bail Amount &gt;= \$100K / Remand</u>	Severe than

## Custody Level

The inmate in question will be classified as:

  X   Minimum                             Medium                             Maximum

Inmate Signature upon receipt: \_\_\_\_\_ Date:     /     /

Classification Officer's Signature: \_\_\_\_\_ Date:     /     /

Class. Sup. Signature (if override): \_\_\_\_\_ Date:     /     /

Any inmate who wishes to dispute his/her classification score and/or custody level shall identify with a check the indicator(s) scored and/or circle the overrides that the inmate believes are factually incorrect or based on incorrect factual information.

The inmate shall forward this form disputing his/her classification score and/  
custody level to the Inmate Grievance Resolution Program office.

I hereby dispute my initial/reclassification score and/or custody level.

Inmate's Signature: \_\_\_\_\_ Date:     /     /



Dear Court

My man is the coDefendant  
Grace Court 25-74 8th St  
East Elmhurst NY 11370

yes we want to sue  
we want hearings and  
judgment

My house is in foreclosure D.O.T.H.  
Case my man needs me!  
I am in jail ~~for~~ falsely accused!  
Please can you help. I need this  
case see in the appeals court  
the Queens Supreme court covered  
my false arrest for asking for Annual  
Bills and have kept false  
charges on me leading to  
false convictions

Sincerely,  
E. J. L.  
L

RECEIVED OFFICE  
SDNY PRO SE OFFICE  
2019 MAY -2 PM 1:10  
U.S. DIST. CT. OF N.Y.





Richard Grant / Baker Ishid

Rose M. Singh

1119 Hays St

East Elmhurst NY 11372

616 441 805 702

SUNY PRO SE OFFICE

2019 MAY -2 PM 12:47

S.D. OF N.Y.

SUNY  
PRO SE  
K3

South Blvd

500 Len St

NY 10007-1312

Prose of file



1000



10007

U.S. POSTAGE PAID  
EAST ELMHURST, NY  
11370  
APR 29, 19  
AMOUNT

\$2.35

R2305K134340-97